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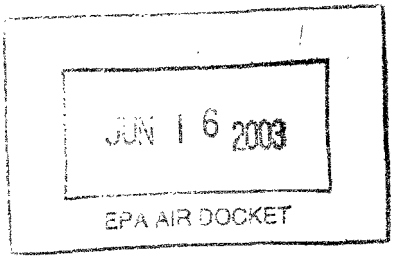

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June 11, 2003

EPA Docket Center (6102T)
Attention Docket Number OAR-2002-0053
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Comments on Standards of Performance for Stationary Gas Turbines, Proposed Rule, 68 Fed. Reg. 17,990 (April 14, 2003)

Dear Sir or Madam:

The Dayton Power and Light Company ("DP&L") and its affiliate DPL Energy, LLC (hereafter collectively referred to as "DPL") hereby incorporate by reference the any comments submitted by the Utility Air Regulatory Group ("UARG") and the Class of '85. DP&L is a member of both organizations. DPL appreciates the opportunity to comment on the changes proposed to Subpart GG of the New Source Performance Standards (NSPS) for Stationary Gas Turbines. On behalf of DPL , the following additional comments are presented for consideration.

Background

DPL owns and operates 38 existing combustion turbines for peaking purposes, located at six sites in Ohio and one site in Indiana. These units are all simple cycle combustion turbines. Some are frame-type units and some are aeroderivatives. All of the aeroderivative units are diffusion flame, while the frame-type units are either diffusion flame, lean pre-mix, or both depending on dual fuel capabilities. Thirty of these units are subject to the Subpart GG requirements. Twenty-nine of these units have approved petitions for alternative monitoring and/or custom fuel schedules.

EPA Should Remove the ISO Correction Requirement

Of the thirty units operated by DPL that are subject to Subpart GG, twenty-nine are also subject to 40 CFR Part 75 requirements for emissions monitoring. Under Part

75, NOx concentration data is corrected to 15% oxygen, not to ISO conditions. The NOx concentration limits for new sources are much more stringent than Subpart GG requirements, rendering the need to correct to ISO conditions obsolete. The combustion turbine technology for NOx emissions control is far superior today than what was contemplated by Subpart GG. DPL recommends that EPA harmonize Subpart GG with the Part 75 monitoring requirements, eliminating any requirement to correct to ISO conditions, instead correcting to 15% oxygen.

EPA has proposed in §60.335 (b)(1) to make optional the use of the ISO correction equation for lean premix turbines, units used in association with heat recovery steam generators equipped with duct burners and units equipped with add-on emission control devices. EPA does not recognize the use of water injection as an add-on emission control device. EPA should recognize that many lean premix units operate in limited use diffusion flame mode with water injection for emissions control.

DPL operates a number of units where the primary fuel is natural gas and is combusted in the lean premix mode. Fuel oil can only be combusted in diffusion flame mode, during which emissions are controlled by water injection. The use of fuel oil is restricted to minimize annual emissions; the NOx concentration is limited to 42 PPM, excluding startup, shutdown and malfunctions. To avoid multiple requirements on a single turbine, DPL recommends that EPA recognize these dual-fuel units as lean premix where the primary fuel is natural gas combusted in lean premix mode. Further, DPL suggests that EPA exempt from ISO correction units that employ water injection when monitored in accordance with Part 75 requirements.

Additionally, if EPA does not eliminate the ISO correction requirements, EPA should not require the reporting of ambient conditions under §60.334(j)(1)(iii)(C), especially when ISO corrections are not required by §60.335(b)(1).

EPA Should Modify the 4-Hour Averaging Period for Turbines Using NOx and O2 CEMs to Exclude Startup, Shutdown and Malfunctions

In §60.334(j)(1)(iii)(A), EPA has proposed an averaging time of 4 hours for turbines using NOx continuous emission monitoring (CEMs) for the purpose of excess emissions reporting. EPA has stated that this represents the overall elapsed time in a typical Method 20 source test. Perhaps an oversight, but the proposed language appears to ignore the exclusions allowed under §60.8. During source testing, emissions would be excluded due to startup, shutdown and malfunctions, in accordance with §60.8 (c): "Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission

limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard."

EPA should modify §60.334 (j)(1)(iii)(A) to add language clarifying that the average excludes emissions from startup, shutdown and malfunctions. Notwithstanding earlier comments to eliminate ISO correction, the requirements of §60.334 (j)(1)(iii)(C) to report ambient conditions is unnecessary and should be removed for sources that are monitoring emissions pursuant to Part 75 requirements.

EPA Should Clarify That Excess Emissions and Monitor Downtime Include Only Hours When Unit is Operated

In §60.334(j)(2) EPA states that periods of excess emissions and monitor downtime ends on the date and hour of the next valid sample. EPA should clarify that the period of excess emissions and/or monitor downtime from the start date to the next valid sample includes only unit operating hours. Further, if no fuel oil has been combusted in the reporting period, failure to sample deliveries of fuel oil should not be considered a deviation.

DPL interprets that if under option (ii) the percent by weight exceeds 0.8 weight percent, but under option (i) does not exceed 0.8 weight percent, no deviation need be reported. If this is not the case, EPA should clarify the statement in (ii) that reads "...shall evaluate excess emissions according to paragraph (j)(2)(i)".

DPL appreciates EPA's effort to update the Subpart GG requirements consistent with Part 75, incorporating many of the alternative monitoring and custom fuel schedule provisions that have been approved by EPA. The proposed changes should help in eliminating redundant requirements in Part 60 and Part 75, where both Parts are applicable to the turbine.

Sincerely,

Amy M. Wright

C: Jaime Pagan, USEPA, electronically at pagan.jaime@epa.gov